

Union Electric

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56

DOCKET NUMBER
PROPOSED RULE **FD 26**
(70FR 50442)

DOCKETED
USNRC

December 27, 2005

December 27, 2005 (2:35pm)

Secretary,
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF



ULNRC-05245

Ladies and Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
COMMENTS ON PROPOSED RULE REGARDING
FITNESS FOR DUTY (FFD) PROGRAMS, RIN 3150-AF12
(70 FR 50422)

Provided below are comments from the Union Electric Company (AmerenUE, Callaway Plant) on the proposed rulemaking regarding Fitness for Duty (FFD) programs (see 70 FR 50444 dated August 26, 2005). AmerenUE believes that certain aspects of the proposed rule are disruptive or have no value while imposing hardship on licensees and their employees. In particular, the group work hour limits should not be imposed. The proposed 24 hour and 48 hour rest requirements are unnecessarily disruptive of the normal shifts now employed by many licensees. Attached are examples of 8-hour shift rotations that are currently used by departments at Callaway Plant which would not be viable under the proposed rule changes.

In addition, AmerenUE has worked with the Nuclear Energy Institute (NEI) in reviewing this proposed rulemaking and support the comments submitted by the NEI on December 20, 2005 in regard to *Managing Fatigue* and *Drug and Alcohol* portions of the proposed rule.

Template = SECY-067
a subsidiary of Ameren Corporation

SECY-02

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AmerenUE appreciates the opportunity to comment on the on the proposed rule regarding fitness for duty programs. If there are any questions regarding these comments, please contact me at 573-676-8659 or David Shafer at 314-554-4104.

Sincerely,

David Shafer
for Keith D. Young
Manager - Regulatory Affairs

Enclosure: Shift Rotations

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Enclosure to ULNRC-05245

Shift Rotations: TRIS Work Group #12196
TRIS Work Group #12199

TRIS WORK GROUP #12196 - CHEMISTRY TECHS (Demand)

16 Week Rotation Cycle

WORKING HOURS

AM 7:00-3:00 (0700-1500)

PM 3:00-11:00 (1500-2300)

OWL 11:00-7:00 (2300-0700)

ROTATION SCHEDULE #1510								
Schedule #	Weeks	S	M	T	W	T	F	S
179	1			P	P	P	P	P
211	2	P	P			O	O	O
210	3	O	O	O	O			A
163	4	A	A	A	A	A		
156	5-16		A	A	A	A	A	

Work Holidays
 Work Holidays
 Work Holidays
 Work Holidays
 12 Weeks (Friday AM
 Holidays are
 canvassed)

Distribution of 6 week schedules:

**TRIS WORK GROUP #12199 (Demand)
HP OPS R/C TECH (Includes Assistant Tech)**

20 week rotation.

WORKING HOURS

AM 7:00-3:00 (0700-1500)

PM 3:00-11:00 (1500-2300)

OWL 11:00-7:00 (2300-0700)

ROTATION SCHEDULE #1158									
Schedule #	Weeks	S	M	T	W	T	F	S	
177	1			A	A	A	A	A	Work Holidays
180	2	A			P	P	P	P	Work Holidays
189	3	P	P	P			O	O	Work Holidays
164	4	O	O	O	O	O			Work Holidays
156	5-12		A	A	A	A	A		8 Weeks (Monday AM Holidays are canvassed)
155	13		P	P	P	P	P		Don't Work Holidays
156	14-20		A	A	A	A	A		7 Weeks (Monday AM Holidays are canvassed) (the person on last week of AMs is canvassed first)

Distribution of 6 week schedules:

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From: "Shafer, David E" <DShafer@ameren.com>
To: <SECY@nrc.gov>, <jnd@nrc.gov>
Date: Tue, Dec 27, 2005 11:21 AM
Subject: Comments on Proposed Rule Regarding Fitness for Duty (FFD) Programs, RIN 3150-AF12

Attached is an electronic copy of comments submitted by Union Electric Company (AmerenUE, Callaway Plant) in regards to Proposed Rule Regarding Fitness for Duty (FFD) Programs, RIN 3150-AF12.

<<CALW ULNRC-05245.pdf>>

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